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FILED

JUL 18 2019

Clerk, U S District Court
District Of Montana
Billings

ATTORNEYS FOR PLAINTIFF
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DONALD RAYMOND FOOTE, JR.,

Defendant.

CR 19- 95 -BLG- SPW

INDICTMENT

STALKING

Title 18 U.S.C. §§ 2261A(2)(B), 2265A(a)
(Count I)

(Penalty: Mandatory minimum one year to
ten years imprisonment, \$250,000 fine, and
three years supervised release)

**INTERSTATE VIOLATION OF
PROTECTIVE ORDER**

Title 18 U.S.C. §§ 2262(a)(1), 2265A(a)
(Count II)

(Penalty: Ten years imprisonment, \$250,000
fine, and three years supervised release)

THE GRAND JURY CHARGES:

COUNT I

That beginning in or before July 2018, and continuing through December 2018, at Billings, in Yellowstone County, in the State and District of Montana, and in the State and District of Wyoming, and elsewhere, the defendant, DONALD RAYMOND FOOTE, JR. with the intent to harass, intimidate, and place under surveillance with intent to harass and intimidate, Jane Doe 1 and Jane Doe 2, used an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce, to engage in a course of conduct that caused, or would reasonably be expected to cause, substantial emotional distress to Jane Doe 1 and Jane Doe 2, in violation of 18 U.S.C. § 2261A(2)(B).

COUNT II

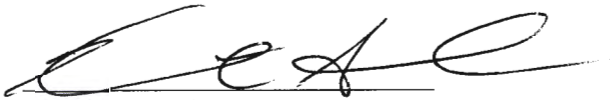
That in or about December 2018, at Billings, in Yellowstone County, in the State and District of Montana, and in the State and District of Wyoming, the defendant, DONALD RAYMOND FOOTE, JR., with the intent to engage in conduct in violation of a Permanent Order of Protection, previously issued by the Billings Municipal Court in Case Number CV-925-2018-0000256-OP, dated October 30, 2018, which ordered protection for Jane Doe 1, Jane Doe 2, and John Doe 1, from harassment, annoyance, disturbance of the peace, communication,

either directly or indirectly, and ordered that the defendant, DONALD RAYMOND FOOTE, JR., shall stay at least 1500 feet from Jane Doe 1, Jane Doe 2, and John Doe 1, travelled from the State of Wyoming into the State of Montana, thereby crossing a State line, and engaged in such conduct, in violation of 18 U.S.C. § 2262(a)(1).

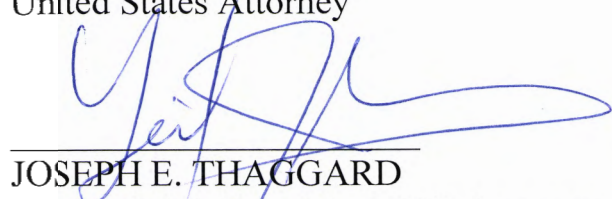
A TRUE BILL.

Foreperson signature redacted. Original document filed under seal.

FOREPERSON



KURT G. ALME
United States Attorney



JOSEPH E. THAGGARD
Criminal Chief Assistant U.S. Attorney

Crim. Summons _____

Warrant: ☒ _____

Bail: ☒ _____